

**WITHOUT COMPENSATION APPOINTMENTS FOR
NON-VA STAFF CONDUCTING RESEARCH**

1. **PURPOSE:** The purpose of this policy is to establish procedures and responsibilities for obtaining appointments for non-VA personnel participating in research activities.
2. **POLICY:** The policy of the South Texas Veterans Health Care System (STVHCS) is that all personnel participating in research conducted within the STVHCS must have either a VA-salaried appointment or a Without Compensation (WOC) appointment.
3. **ACTION:**

a. Principal Investigator (PI):

(1) Prospective (New) Principal Investigators must initiate their own WOC appointment through their respective VA sponsoring service. (see B (2) of this policy)

(2) PIs who wish to conduct research within the STVHCS are responsible for insuring that all personnel working on the research study, including themselves, are credentialed by Research Service to conduct research within the STVHCS (ATTACHMENT A) and have a current VA-salaried or Without Compensation (WOC) appointment.

(3) It is the responsibility of the PI to submit an investigator request (ATTACHMENT D) to their respective service to initiate the process to obtain a WOC appointment for any individual who will be part of the research team at the STVHCS and to ensure that the individual does not commence research activities at the STVHCS until the WOC appointment is completed.

(4) In addition to ATTACHMENT D, the PI may be required to submit additional attachments to their Primary Service, based on the category of WOC employee listed below:

(a) Licensed physicians:

1 Non-VA salaried physicians and licensed M.D. fellows not processed through Education Service (not part of an ACGME-accredited training program) must initiate a WOC request (ATTACHMENT B) through their respective department of the affiliated institution to the VA sponsoring service. The WOC appointment request (ATTACHMENT B) must be submitted to the Professional Standards Board Chairman through the sponsoring VA service. *Note: fellows who are part of an ACGME-accredited training program have already had a VA appointment processed through the Education Service, but must contact Research Service to obtain research privileges to conduct research within the STVHCS.*

2 Non-VA salaried physicians who are contracted to perform clinical services (i.e., contract anesthesiologists, surgeons, radiologists) but also wish to conduct research must obtain a WOC appointment since the clinical contract does not cover the conduct of research activities. A WOC appointment request (ATTACHMENT C) to conduct research must be submitted to the Chairman of the Professional Standards Board through their contracting service.

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(b) non-licensed personnel--No additional attachments are required for non-licensed personnel which includes non-licensed MD research fellows.

(c) licensed non-physician personnel--All licensed nurses must be boarded as a Nurse through the Nursing Board (contact Nursing Service for application).

(5) If the research will continue past the WOC expiration date, the investigator must insure that all personnel working on the research study, including themselves, request appropriate extensions through their respective service office a month prior to the expiration.

(6) If the research has been completed or a member of their investigator's personnel staff is no longer conducting research within the STVHCS, the investigator must notify the Research Office and their respective Service Chief and follow the action outlined in Policy Memorandum 05-06-15, Employee and/or Affiliate Exit Clearance.

b. Primary Service and Service Chief:

(1) The Primary Service to which the PI is appointed will initiate the WOC appointment (ATTACHMENT E or F) for any of that investigator's research staff to include credentialing through the Chairman of the Professional Standards Board when necessary.

(2) The Primary Service will process Prospective (New) Principal Investigators according to 3 A (4) of this policy.

(3) The Primary Service administrative staff has the overall responsibility for coordinating an effective WOC appointment program in conjunction with HRMS. The administrative staff is responsible for preparing and updating all forms, communicating to the PIs and prospective WOC appointees, data management and record keeping related to that WOC appointee.

(4) The administrative staff of the Primary Service will:

(a) Review for accuracy all documents submitted before forwarding the entire WOC application packet to Research Service.

(b) Complete the WOC Processing Checklist (ATTACHMENT G) and attach to WOC application packet.

(c) Maintain a copy of the entire WOC packet submitted to Research Service.

(d) Update WOC service specific employee tracking records.

(e) Enter and track employee training in the appropriate database(s).

(5) The Service Chief to which the WOC employee is appointed is responsible for ensuring that the WOC employee fulfills all responsibilities related to the WOC employment at the STVHCS.

c. Research Office staff and ACOS for Research:

(1) When the WOC applicant will be appointed in another service the Research Service staff is responsible to:

(a) Review the WOC application packet for accuracy and completeness when received from the primary appointing service.

(b) Verify the completion of research-specific training

(c) Review and approve the Scope of Practice for anyone requesting involvement in a human subjects protocol.

(d) Verify education (degree), licensing, and credentialing as appropriate.

(e) Verify signed intellectual property agreement.

(2) Research Service AO will be responsible for obtaining electronic badge access to the research lab area and Veterinary Medical Unit for any WOC appointee if necessary.

d. Human Resources Management Service (HRMS) Staff:

(1) The responsibility of HRMS is to provide technical assistance and timely processing of WOC applications.

(a) Upon receipt of the WOC application packet from the Research Service it will be logged into a tracking system.

(b) The WOC application documents will be reviewed for completeness and accuracy.

(c) The background check will be initiated.\

(d) Credentialing will be verified with the appropriate Service.

(e) Fingerprinting of the WOC applicant will be performed.

(f) The WOC applicant will be scheduled to go to Employee Health and have the PPD placed and read.

(g) The WOC applicant will be scheduled to have ID badge made.

(h) The official Appointment Letter will be prepared for the Director's signature.

(i) Schedule WOCs for New Employee Orientation.

(j) Upon approval, issue an appointment letter to the Primary Service stating the appointment is complete.

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(k) Maintain a database of current WOC employees.

(l) Provide notice to the Research Service and the Primary Service of the expiration dates of the WOC appointees conducting research and request a renewal or clearance of the WOC when necessary.

e. Security Police Service Staff:

The Security Police Service is responsible for providing final security clearance at the STVHCS.

(a) Issue the photo ID badge once the WOC appointment is approved.

(b) Provide badge electronic access to the research laboratory areas when requested for the WOC employee by the Research Service.

f. Employee Health Staff--The Employee Health Staff is responsible for providing final medical clearance at the STVHCS.

(1) Perform pre-employment medical history.

(2) Administer and read PPD.

4. **REFERENCE**: VHA Supplement MP-5, Part II, Chapter 2, Change 1, dated July 11, 1991.

5. **RESPONSIBILITY**: ACOS for Research and Development (151).

6. **RESCISSION**: STVHCS Policy Memorandum 151-07-04, dated February 9, 2007

7. **RECERTIFICATION**: May 2011

(original signature on file)

RICHARD J. BALTZ, FACHE
Director

Attachments

DISTRIBUTION: A

Required Information for Obtaining VA Research Privileges

1. VA Credentialed Physicians - Contract Status

- a. Documentation of Human Subjects Training and VA Security Training¹
- b. Without Compensation (WOC) appointment for Research Privileges added to credentialing status (memo to the Medical Staff Office signed by appropriate Service Chief)
- c. Signed Intellectual Property Agreement (IPA)

2. VA Credentialed Physicians – VA Salaried--Documentation of Human Subjects Training and Security Training¹

3. Fellows, Med Students (3rd and 4th year), and Residents -

- a. Documentation of Human Subjects Training and VA Security Training¹
- b. Copy of appointment memo (obtained from the VA Education Office x.15109)
- c. Signed Intellectual Property Agreement (IPA)
- d. Scope of Practice

4. Other

- (a) Documentation of Human Subjects Training and VA Security Training¹
- (b) If NOT VA salaried, WOC appointment (submit through the appropriate service)
- (c) Signed Written Release of Information
- (d) Signed Intellectual Property Agreement (IPA) – FOR WOC's ONLY
- (e) Scope of Practice

5. Exempt²

- a. Documentation of VA Security Training¹
- b. Memorandum from PI denotes what their role in the study will be (specify contact with research subject(s) and data access)

Attachment A

¹ VA Security Training: VA Research Data Security and Privacy, VA Cyber Security Awareness, and VHA Privacy Policy Web Training

² Exempt personnel consists persons who are not physically conducting research on VA property, only have access to de-identified data and/or not directly working with research subjects (i.e., lab personnel, data personnel, administrative personnel)

This letter is forwarded to the department of the affiliated institution for placement on their letterhead and signature by their representative.

**Department of
Veterans Affairs**

Memorandum

TO: Name of Chief of Staff
 Chief of Staff
 South Texas Veterans Health Care System

FROM: Name of Department Chair
 Title(s)
 Name of Department

SUBJECT: Request for WOC Appointment to Conduct Research within the STVHCS

1. It is proposed to appoint Name of licensed physician, Title, as a WOC research physician at the Audie Murphy VA Hospital.

2. The following information required by the Federation of State Medical Boards:

NAME:
SOCIAL SECURITY NO.:
MEDICAL SCHOOL ATTENDED:
YEAR OF GRADUATION:
DATA OF BIRTH:
PROPOSED VA APPOINTMENT:
APPOINTMENT DATE:

3. Appointment forms are attached and directed to the Chief of Name of VA Service. Point of contact for further information is **xxxx**.

Name of Department Chair
Title(s)
Name of Department

name of Chief of Service
Chief, name of Service

**Department of
Veterans Affairs**

Memorandum

Date: <date>

From: Requestor's Service/Dept. Chief, name of Service Service (Mail Code)

Subj: Addition of Research Privileges

To: Chairman, Professional Standards Board (11M)

1. Request a without compensation (WOC) appointment as a Research Investigator for <name>, with <beginning> and <ending> dates concurrent with clinical credentialing/privileging.

2. Point of contact for further information is <xxxx>.

name of Requestor's Chief of Service (capitalized)

Attachment C

NAME :

**APPLICATION FOR
WITHOUT COMPENSATION (WOC) APPOINTMENT
REQUIRED DOCUMENTS**

- ☐ **YES** 01 Investigator Request
- ☐ **YES** 02 Position Description/Scope of Work (human research only)
- ☐ **YES** 03 Declaration for Federal Employment (OF 306)
- ☐ **YES** 04 Application for Federal Employment (OF 612) – non nurses
- OR**
- ☐ **YES** 05 Application for Nurses (VA 10-2850a); Certification of License -- Nurses Only
- ☐ **YES** 06 Employment Eligibility Verification (I-9), with **original** documents indicated on I-9 (originals will be returned)
- ☐ **YES** 07 Non-availability of Citizen Memo (for non-citizens only)
- ☐ **YES** 08 Questionnaire for Non-sensitive Positions (SF 85), background check
- ☐ **YES** 09 Medical History (SF 93)
- ☐ **YES** 10 Fingerprint Information Card
- ☐ **YES** 11 Oath Statement
- ☐ **YES** 12 Intellectual Property Agreement
- ☐ **YES** 13 Orientation and Training Verification
- ☐ **YES** 14 Request for Personal Identity Verification Card (VA 0711)
- ☐ **YES** 15 Completed safety course tests: TB, Bloodborne Pathogens, Security and EOC policies

Note: Individual files can be found on Research Service Webpage

PROCESS:

1. Return completed package to Office Number, POC, etc..
2. Applicant will be contacted to schedule the required TB testing and fingerprinting.
3. If you have any questions, please contact the POC, ext. Contact Telephone Extension.

Department of Veterans Affairs

Memorandum

Date: <date>

From: Requestor's Service/Dept. Chief, name of Service Service (Mail Code)

Subj: WOC Appointment to name of Service - Citizen

To: Director (00)

Thru: Chief, Human Resources Management Service (05)

Name of WOC Coordinator (05B)

1. In accordance with VHA Handbook 5005, Part II, Chapter 2, paragraph 4c, it is requested that the following individual be appointed as a Without Compensation employee to conduct research within the STVHCS:

Name:	
SSN:	
Requested by:	
Purpose:	
Start Date:	
Expiration Date:	

2. If you have any questions, please contact the POC, ext. Contact Telephone Extension.

name of Requestor's Chief of Service (capitalized)

Department of Veterans Affairs

Memorandum

Date: <date>

From: Requestor's Service/Dept. Chief, name of Service Service (Mail Code)

Subj: WOC Appointment to name of Service – Non-Citizen

To: Director (00)

Thru: Chief, Human Resources Management Service (05)
Name of WOC Coordinator (05B)

1. In accordance with VHA Handbook 5005, Part II, Chapter 2, paragraph 4c, it is requested that the following individual be appointed as a Without Compensation employee to conduct research within the STVHCS:

Name:	
SSN:	
Requested by:	
Purpose:	
Start Date:	
Expiration Date:	

2. If you have any questions, please contact the POC, ext. Contact Telephone Extension.

name of Requestor's Chief of Service (capitalized)

Attachments : 1. Investigator Request w/Position Description
2. Declaration for Federal Employment/Resume
3. I-9 with Employment Authorization Documents
4. Background Form (SF-85)

RECOMMEND APPROVAL/DISAPPROVAL

RECOMMEND APPROVAL/DISAPPROVAL

OLGA ANDREWS
Acting Chief, Human Resources Management Services

RICHARD BAUER, M.D.
Chief of Staff

RECOMMEND APPROVAL/DISAPPROVAL

RECOMMEND APPROVAL/DISAPPROVAL

VICKI A. KENDRICK, FACHE, MHSA
Acting Associate Director

ANDREW M. WELCH, MHA, FACHE
Acting Director

Attachment F

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Processing Checklist to Obtain Without Compensation (WOC) Appointment to Conduct Research

Applicant Name: _____ Responsible PI: _____
 (PRINTED NAME) (PRINTED NAME) (INITIALS)

Telephone: _____ VA Service: _____

E-mail: _____ Type of Research (circle): Animal Human Lab

Required Information for Obtaining VA Research Privileges (Primary Service Use Only):

Training, all	Completed	Verified Date & Initials
VA Research Data Security and Privacy Training	<input type="checkbox"/>	
VA Cyber Security Awareness	<input type="checkbox"/>	
VHA Privacy Policy Web Training	<input type="checkbox"/>	
http://www.vcampus.com/vcekpvalo/		
Human Research Training, if applicable		
VA Human Subjects Protection/Good Clinical Practice	<input type="checkbox"/>	
http://www.citiprogram.org		
Other Documentation		
VA Scope of Practice	<input type="checkbox"/>	
Signed Written Release of Information	<input type="checkbox"/>	
http://www.south-texas.med.va.gov/research/html/personnel.htm		
Animal Research Training, if applicable		
VA IACUC	<input type="checkbox"/>	
VA Species, working with (i.e., mice, rat, hamster, guinea pig)	<input type="checkbox"/>	
if involved in surgery, complete VA Post Procedure	<input type="checkbox"/>	
http://www.citiprogram.org		
Lab Research Training, if applicable		
VA ORD Biosecurity Training	<input type="checkbox"/>	
http://www.citiprogram.org		

Date submitted to Research Prog. Support w/initials: _____

Research Office Use Only (processing time 2 working days):

LEIE check ☐ VA credentialing verified ☐ Degree Verification ☐

License Verification ☐ Date completed w/initials: _____

Human Resources:

Date submitted to HR w/initials: _____ Processing Time 5 working days

WOC Processing	Completed	(Date and Initial by HRMS)
Verify credentialing, Medical Staff Office	<input type="checkbox"/>	
VA Form 0711, Request for Personal Identity Verification Card	<input type="checkbox"/>	
SF Form 85, Questionnaire for Non-sensitive Positions	<input type="checkbox"/>	
Fingerprinting	<input type="checkbox"/>	
Oath of Office	<input type="checkbox"/>	
Schedule PPD Date & Time:	<input type="checkbox"/>	
Schedule ID Badge Processing Date & Time:	<input type="checkbox"/>	

Reverse Side for Continuation
Continuation

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Employee Health:

Processing Time 2 working days

Intake	Completed <input type="checkbox"/> <input type="checkbox"/>	(Date and Initial)
Medical History		
Administer PPD Test Date & Time:		

Police Service:

Processing Time 1 working day

Intake	Completed <input type="checkbox"/> <input type="checkbox"/>	(Date and Initial)
ID Badge Processed		
Parking Information		

[illegible]